

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GREAT NORTHERN INSURANCE  
COMPANY, INC.,

Plaintiff,

-against-

ECF Case  
08 CV 03308 (SHS)(GWG)

ANSWER TO CROSS-CLAIM  
OF DEFENDANT HANJIN  
SHIPPING CO., LTD.

BLUE ANCHOR LINE, BLUE ANCHOR  
LINE, A DIVISION OF TRANSPAC  
CONTAINER SYSTEM LTD., KUEHNE  
& NAGEL, INC. and KUEHNE & NAGEL,  
S.A., HANJIN SHIPPING CO., LTD.,  
CONTAINER PORT GROUP, INC.,

Defendants.  
-----X

Defendants, Blue Anchor Line, Blue Anchor Line, a Division of Transpac Container System, Ltd., Kuehne & Nagel, Inc. and Kuehne & Nagel, S.A. answering the cross-claim of the defendant Hanjin Shipping Co., Ltd. as against these defendants, alleges:

1. Denies knowledge or information sufficient to form a belief as to the allegations referred to in paragraph 31 of the answer and begs leave to refer to the answer to the defendant's answer to the complaint, including the affirmative defenses therein, with the same force and effect as if repeated and set forth at length.

2. Denies knowledge or information sufficient to form a belief as to the allegations in paragraph 32.

3. Defendant, Blue Anchor Line; Blue Anchor Line a Division of Transpac Container System, Ltd. admits the allegations of paragraph 33 of the answer herein

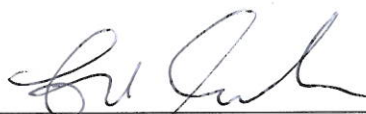
insofar as it provides services as a non-vessel operating common carrier, subject to the terms and conditions of bills of lading it issues.

4. Defendants, Kuehne & Nagel, Inc. and Kuehne & Nagel, S.A. deny each and every allegation contained in paragraph 33 of defendant's cross-claim.

5. Defendants deny each and every allegation contained in paragraph 34 of the cross-claim.

WHEREFORE defendants Blue Anchor Line, Blue Anchor Line, a Division of Transpac Container System, Ltd., Kuehne & Nagel, Inc. and Kuehne & Nagel, S.A. demand judgment dismissing the cross-claim against each of them with costs and attorneys fees.

Dated: New York, New York  
August 13, 2008



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Ernest H. Gelman (EHG 4748)  
Attorney for Defendants Blue Anchor Line,  
Blue Anchor Line, a Division of Transpac  
Container System, Ltd., Kuehne & Nagel,  
Inc. and Kuehne & Nagel, S.A.  
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AFFIDAVIT OF SERVICE BY E-MAIL

STATE OF NEW YORK )  
COUNTY OF NEW YORK) ss.:

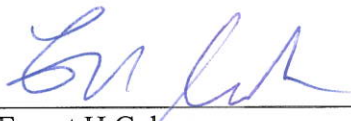
Ernest H. Gelman, being duly sworn, says:

I am not a party to the action, am over 18 years of age and work in New York City.

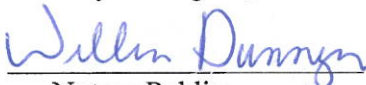
On the 14<sup>th</sup> of August, 2008 I served the within ANSWER OF DEFENDANTS, BLUE ANCHOR LINE, KUEHNE & NAGEL, INC. AND KUEHNE & NAGEL, S.A. to the Cross Claim of Defendant, Hanjin Shipping Co. Ltd. by e-mail addressed to each of the following persons at the last known e-mail address set forth after each name:

David Mazaroli, Esq.  
Attorney for Plaintiff  
11 Park Place  
Suite 1214  
New York, NY 10007-2801  
[dln@mazarolilaw.com](mailto:dln@mazarolilaw.com)

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Burke & Parsons  
Attorneys for Hanjin Shipping Co. Ltd  
100 Park Avenue  
New York, NY 10017  
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\_\_\_\_\_  
Ernest H Gelman

Sworn to before me the  
21<sup>st</sup> day of August, 2008.



Notary Public  
WILLIAM DUNNEGAN  
Notary Public, State of New York  
No. 31-4773203  
Qualified in New York County  
Commission Expires October 31, 2010